

ESTTA Tracking number: **ESTTA375027**

Filing date: **10/25/2010**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91196099
Party	Plaintiff Threeline Imports, Inc.
Correspondence Address	CHARLES H. KNULL ULLMAN SHAPIRO & ULLMAN LLP 299 BROADWAY, SUITE 1700 NEW YORK, NY 10007 UNITED STATES tms@usulaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Charles H. Knull
Filer's e-mail	chk@usulaw.com, tms@usulaw.com
Signature	/Charles Knull/
Date	10/25/2010
Attachments	Babkiny motion to extend.pdf (3 pages)(682801 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

- - - - -x

Threeline Imports, Inc.,

Opposer,

Opposition # 91196099

vs.

Obschestvo s ogranichennoy;
otvetstvenn ost'yu; Babkiny
semechki",

Applicant

- - - - -x

CONSENTED MOTION TO EXTEND
DISCOVERY PERIODS BY THIRTY DAYS

To: Honorable Commissioner for Trademarks
P.O Box 1451
Alexandria, VA 22313-1451

Sir:

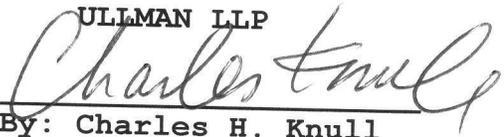
Opposer, by its undersigned attorneys of record herein, and with the consent of the attorneys for the Applicant, obtained in a teleconference and subsequent emails between the undersigned and Robyn S. Lederman, Esq. during this past week, hereby moves the Board, pursuant to Trademark Rule 2.121(d), to enter an

ORDER, extending for period of thirty (30) days, from October 26, 2010 (currently the opening date of Discovery), making the opening date of discovery November 25, 2010, and moving all the dates set by the Board in an Order mailed August 26, 2010, with the new dates being as follows:

Deadline for Discovery Conference	11/25/2010
Discovery Opens	11/25/2010
Initial Disclosures Due	12/25/2010
Expert Disclosures Due	4/25/2011
Discovery Closes	5/24/2011
Plaintiff's Pretrial Disclosures	7/8/2011
Plaintiff's 30-Day Trial Period Ends	8/23/2011
Defendant's Pretrial Disclosures	9/7/2011
Defendant's 30-Day Trial Period Ends	10/21/2011
Plaintiff's Rebuttal Disclosures	11/6/2011
Plaintiff's 15-Day Rebuttal Period Ends	12/5/2011

This request for extension is the first and is because discussions begin between the parties may well result in a settlement of this matter.

Respectfully submitted,
ULLMAN, SHAPIRO &
ULLMAN LLP


By: Charles H. Knull

Dated: New York, New York
October 25, 2010